

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
GREENEVILLE DIVISION**

B.P., et al.,

Plaintiffs,

v.

No: 2:23-cv-00071-TRM-JEM

CITY OF JOHNSON CITY, TENNESSEE, et al.,

Defendants.

_____/

DECLARATION OF VANESSA BAEHR-JONES

I, VANESSA BAEHR-JONES, declare under penalty of perjury that the foregoing is true and correct:

1. I am over twenty-one years of age and am competent in all respects to give this Declaration. This Declaration is given freely and voluntarily. I have personal knowledge of the foregoing matter and could, and would, testify competently thereto under penalty of perjury.
2. I am lead counsel for Plaintiffs B.P., et al., in the above-referenced case. I am a licensed attorney in good standing in the State of California (CABN 281715) and admitted to appear *pro hac vice* in this District.
3. Attached hereto as Exhibit 1 is a table outlining all theories of the case, associated claims, defendants, and alleged facts.
4. Attached hereto as Exhibit 2, and filed under seal, is a true and correct copy of the Johnson City Police Department (“JCPD”) report in the case of Female 8.

5. Attached hereto as Exhibit 3, and filed under seal, is a true and correct copy of Female 8's written statement which she provided to JCPD on or about July 15, 2022.

This is the _1_ day of May 2024.

/s/ Vanessa Baehr-Jones

VANESSA BAEHR-JONES